

**UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)
SIPA LIQUIDATION
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC
Plaintiff,

Adv. Pro No. 10-05128 (SMB)

v.

JABA ASSOCIATES LP; ESTATE OF JAMES
GOODMAN; AUDREY GOODMAN, in her
capacity as a General Partner of JABA
Associates LP and in her capacity as Personal
Representative of the Estate of James Goodman;
BRUCE GOODMAN, in his capacity as a General
Partner of JABA Associates LP; and ANDREW
GOODMAN, in his capacity as a General Partner of
JABA Associates LP,

Defendants.

**PROPOSED ORDER GRANTING DEFENDANTS' MOTION TO WITHDRAW THE
REFERENCE**

THIS MATTER having come before the Court on the request of Chaitman LLP, counsel
for Defendants, JABA Associates LP; Estate of James Goodman; Audrey Goodman, in her
capacity as a General Partner of JABA Associates LP and in her capacity as Personal
Representative of the Estate of James Goodman; Bruce Goodman, in his capacity as a General

Partner of JABA Associates LP; and Andrew Goodman, in his capacity as a General Partner of JABA Associates LP (“Defendants”) with respect to Defendants’ motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure; and the Court having reviewed all pleadings and other papers filed and submitted in connection with the motion; and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. Defendants’ motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure is **GRANTED**; and
2. The above-captioned adversary proceeding is withdrawn from the Bankruptcy Court in its entirety.

New York, New York
Dated:

Hon.
United States District Judge